1	STEPHANIE M. HINDS (CABN 154284) United States Attorney		
2 3	THOMAS A. COLTHURST (CABN 99493) Chief, Criminal Division		
4 5 6 7 8 9 10 11	ASSISTANT United States Attorney  450 Golden Gate Avenue, Box 36055 San Francisco, California 94102-3495 Telephone: (415) 436-7200 FAX: (415) 436-7230 David.ward@usdoj.gov  Attorneys for United States of America  UNITED STATES DISTRICT COURT  NORTHERN DISTRICT OF CALIFORNIA		
12	SAN FRANCISCO DIVISION		
14	UNITED STATES OF AMERICA, ) NO. CR 21-00294 WHO		
15	Plaintiff, MOTION TO UNSEAL		
16	v. )		
17	PAUL FREDRICK GIUSTI,		
18	Defendant. )		
19			
20	On August 13, 2021, defendant Paul GIUSTI pled guilty before this Court to a one-count		
21	Information charging him with Conspiracy to Commit Honest Services Wire Fraud. Dkt 26. At the		
22	request of the government, Exhibit A of the Plea Agreement, containing the factual basis for the plea,		
23	was filed under seal because the government's investigation of the facts underlying defendant GIUSTI's		
24	conduct was ongoing. There is no longer an investigative need by the government to keep defendant		
25	GIUSTI's factual admissions in Exhibit A under seal. The undersigned Assistant U.S. Attorney		
26	consulted with counsel for defendant GIUSTI, who has no objection to unsealing Exhibit A.		
27	//		
28	//		
	MOTION TO UNSEAL/PROPOSED ORDER 1 CR 21-00294 WHO		

1	Therefore, the government respectfully requests that this Court order that Exhibit A to defendant		
2	GIUSTI's plea agreement be unsealed.		
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4			
5		STEPHANIE M. HINDS United States Attorney	
6		Office States Attorney	
7	Dated: February 2, 2023	/s/ David J. Ward	
8		DAVID J. WARD Assistant United States Attorney	
9		rissistant Cintod States rittorney	
10	For good cause shown, it is <b>SO ORDERED</b> .	_	
11		1.1. WOO	
12	February 3, 2023 Dated:	W_ H.We	
13		HC JORABLE WILLIAM H. ORRICK United States District Court Judge	
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